



**HOME BUILDERS ASSOCIATION OF CONNECTICUT, INC.**  
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*Your Home  
Is Our  
Business*

March 12, 2010

To: Senator Ed Meyer and Representative Richard Roy, Co-Chairs, and  
members of the Environment Committee

From: Bill Ethier, CAE, Chief Executive Officer

Re: RB 388, AAC Connecticut's Economic and Environmental Future

**The HBA of Connecticut is a professional trade association with 1,100 member firms statewide, employing tens of thousands of Connecticut citizens. Our members are residential and commercial builders, land developers, home improvement contractors, trade contractors, suppliers and those businesses and professionals that provide services to our diverse industry. We estimate that our members build 70% to 80% of all new homes and apartments in the state.**

**We strongly object to section 10 of RB 388 dealing with stormwater authorities. The creation of a new body politic and its associated new authority to adopt taxes, fees, borrow money via bonds, and lien property is unnecessary to address an issue (i.e., stormwater control) that is already well regulated. Extensive stormwater regulations have been adopted by the Department of Environmental Protection and the agency is in the process of completely rewriting its stormwater general permits. Also, we do not know of a single municipality that does not require stormwater to be controlled. And the federal government has recently adopted new requirements for stormwater control under the U.S. Clean Water Act. Thus, stormwater is regulated by three levels of government. Do we really need a new government entity to address a well-regulated issue?**

**The new authority in the bill to be held by the proposed body politic is broad and open-ended, as are the fees and new liens on property for failing to pay fees, fines, charges or other amounts. The new lien on property will have super priority lien status, which will upset the credit financing system currently in place for material suppliers and the lending industry. Given the current difficulties of obtaining credit, this new lien hurdle makes the credit crisis we face worse.**

**We urge you to delete section 10 from the bill. We do not comment on the remainder of the bill and our lack of comment should not be taken or represented to others as our support.**

Thank you for considering our comments on this legislation.